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Via ECF

The Honorable Vernon S. Broderick
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square, New York, NY 10007

Re: *In Re Application of Hornbeam Corp.*; No. 14 Misc. 424, Part 1, S.D.N.Y (VSB)

Dear Judge Broderick:

Intervenor Panikos Symeou submitted a three page letter, ECF 188, in response to the November 13, 2019 Order, ECF 185, allowing the parties to submit “additional information the Court should consider in deciding whether good cause exists for modifying the SAPO [Second Amended Protective Order], or whether Symeou’s requested relief—winding up these proceedings in accordance with SAPO sections 15(c) and (d)—is appropriate”.

In contrast, after telling this Court that it would file new BVI proceedings for almost five years, Applicant Hornbeam Corp. filed a last-minute motion to amend the SAPO, ECF 186 and 187, to allow use of the discovery in domestic proceedings. Symeou intends to respond to Hornbeam’s motion by December 11 in the normal course under Local Civ. Rule 6.1(b).

Sincerely,

/s/ Bruce S. Marks

Bruce S. Marks
For: Marks & Sokolov, LLC
Counsel for Intervenor Panikos Symeou